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November 16, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Pursuant to this Court's Order No. 81 ¶ 4 (Docket No. 1404), counsel for General Motors LLC ("New GM") write to advise the Court of its proposal for resolution of several personal injury plaintiffs' motions for leave to file amended complaints, which were stayed by this Court pending the Bankruptcy Court's adjudication of certain issues implicated by the complaints (*see* Docket Nos. 1487, 1491, 1537, 1594).

New GM proposes that plaintiffs' motions remain stayed. Regardless of any amendment, each of the cases would remain stayed pursuant to this Court's Order No. 1 (Docket No. 19). Additionally, in light of the the Bankruptcy Court's November 9, 2015 Decision, amending the complaints at this time would be premature and create undue labor and expense that would likely be duplicated if further amendments are required. New GM respectfully submits that all parties will benefit from the Bankruptcy Court's entry of Judgment on its Decision and application of that Decision to the amended bellwether trial complaints, which assert many of the same allegations and claims at issue in the stayed cases. The Second Circuit may also decide the expedited appeal of the Bankruptcy Court's June 1, 2015 Decision before the stay imposed by Order No. 1 is lifted, which may provide further guidance before the amendment of each of these 20 complaints is necessary.

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Respectfully submitted,

/s/ Richard C. Godfrey, P.C.
/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: MDL Counsel of Record